

LARRY ROTHMAN & ASSOCIATES
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City Plaza
1 City Boulevard West, Suite 850
Orange, California 92868
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Attorneys for the Defendants:
INTERNATIONAL COLLECTION CORPORATION, CHARLES D.
HENDRICKSON

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

HERMINIA LORENZO CRUZ

Plaintiff,

vs.

INTERNATIONAL COLLECTION
CORPORATION, a California corporation,
CHARLES D. HENDRICKSON,
individually and in his official capacity,

Defendants.

Case No: C08 00991 JF(rx)

EXHIBIT A RE: MEMORANDUM
OF POINTS AND AUTHORITIES
IN OPPOSITION TO MOTION TO
COMPEL

DATE: September 17, 2008
TIME: 9:00 a.m.
COURTROOM: 4

EXHIBIT A RE: MEMORANDUM OF POINTS AND AUTHORITIES
IN OPPOSITION TO MOTION TO
COMPEL

EXHIBIT A

COMMUNIQUE FROM
LARRY ROTHMAN AND ASSOCIATES
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City Plaza
1 City Boulevard West, Suite 850
Orange, California 92868
(714) 363 0220 Telephone
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tocollect@aol.com E-Mail

DATE: July 23, 2008

TO : MR. SCHWIIN

FROM: Larry Rothman (SENT BY MARY DONNE)

message:

RE: ICC ADV BRETANA/CRUZ

Mr. Rothman wishes to "meet and confer" with you with respect to your letters and our clients in order to resolve any discovery dispute prior to Motion. While letters may in some cases be appropriate, Mr. Rothman believes that he may be able to resolve a potential dispute by conferring telephonically.

He is available this coming Friday between 10 – 11:30 a.m. and 12:30 p.m. to 2:30 p.m. Please confirm what time this discussion will take place so I can advise Mr. Rothman the time to call you.

Thank you.

CONFIDENTIAL

The information transmitted in this facsimile message is sent by an attorney or his/her agent is intended to be confidential and for the use of only the individual or entity named above. If the recipient is a client, this message may also be for the purpose of rendering legal advice and thereby privileged. If the reader of this message is not the intended recipient, you are hereby notified that any retention, dissemination, distribution or copy of this facsimile is strictly prohibited. Thank you.

ACTIVITY REPORT (SEND)

JUL/23/2008/WED 19:00

FAX

#	DATE	START T.	RECEIVER	COM.TIME	PAGE	TYPE/NOTE	FILE
01	JUL/23	10:28	8439949	0:03:32	3	OK	G3 9749
02		10:46	8439949	0:02:15	3	OK	G3 9750
03		11:00	5336555	0:02:08	1	OK	G3 9752
04		11:38	16269667830	0:00:38	2	OK	SG3 9756
05		14:09	8439949	0:03:47	3	OK	G3 9760
06		14:08	8439949	0:03:47	3	OK	G3 9759
07		14:19	5623223			NO RESPONSE	9761
08		14:53	19495814646	0:05:00	6	OK	G3 9763
09		15:02	15629295537	0:00:56	2	OK	SG3 9764
10		15:38	17205668943	0:01:05	3	OK	SG3 9765
11		15:58	19497569060	0:00:40	1	ORIGINAL ERROR	G3 9766
12		15:59	19497569060	0:31:49	58	OK	G3 9767
13		16:37	19498740973			CANCEL	9768
14		16:41	19496431169	0:07:17	16	ORIGINAL ERROR	SG3 9769
15		16:48	19496431169	0:03:45	11	OK	SG3 9770
16		16:52	14082946190	0:01:23	1	OK	G3 9771
17		16:54	19496431169	0:10:14	26	OK	SG3 9772
18		17:12	5336555	0:02:08	1	OK	G3 9773
TOTAL				1:20:24	140		
GRAND TOTAL				481:46:02	45610		

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City Plaza
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DATE: July 25, 2008

TO : MR. SCHWIIN

FROM: Larry Rothman (SENT BY MARY DONNE)

message:

RE: ICC ADV BRETANA/CRUZ

Mr. Rothman's case continued until today so he would like to change the "meet and confer" with you July 28, 2008, at 1:00 p.m.

Please confirm if this is fine with you.

Thank you.

CONFIDENTIAL

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ACTIVITY REPORT (SEND)

JUL/25/2008/FRI 19:00

FAX

#	DATE	START T.	RECEIVER	COM.TIME	PAGE	TYPE/NOTE	FILE
01	JUL/25	7:47	15628678120	0:00:19	1	OK	SG3 9791
02		8:33	14082946190	0:01:16	1	OK	G3 9792
03		8:34	15626021929	0:00:54	2	OK	SG3 9793
04		8:56	15626021929	0:00:54	2	OK	SG3 9794
05		13:01	15628678120	0:00:55	4	OK	SG3 9797
06		13:44	16194612457	0:04:04	4	OK	SG3 9798
TOTAL				0:08:22	14		
GRAND TOTAL				482:17:22	45649		

PROOF OF SERVICE

State of California, County of Orange:

I am employed in the county and state aforesaid. I am over the age of 18 and not a party to the within action; my business address is: 1 City Boulevard West, Suite 850, Orange, California 92868

On August 26, 2008, I served the foregoing document described as:

EXHIBIT A RE: MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION TO MOTION TO COMPEL ALL WRITTEN DISCOVERY on the parties listed below in this action by placing a true copy thereof or the originals via electronic mail through the ECF system of the United States District Court to the following

Fred W. Schwinn, Esq.
Consumer Law Center, Inc.
12 South First Street, Suite 1014
San Jose, California 95113-2418

[X] BY ELECTRONIC MAIL. I caused the above document to be electronically mailed through the ECF system of the United States District Court. Executed on August 26, 2008, at Orange California.

[X] FEDERAL. I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury under the laws of United States and the State of California that the above is true and correct.

LARRY ROTHMAN